

REMARKS**INTRODUCTION:**

In accordance with the following, reconsideration of the allowability of the claims is respectfully requested.

Claims 1-23 are pending and under consideration, with claim 23 having been allowed, and claims 2-4, 6, 8, 10, 12-15, and 17-22 having been indicated as including allowable subject matter.

OBJECTION TO THE TITLE

In accordance with the Examiner's helpful comments, the Title has been amended to recite "A DISC CENTERING DEVICE."

REJECTION UNDER 35 U.S.C. §102:

Claims 1, 5, 9, 11, and 16 are rejected under 35 U.S.C. 102(b) as being anticipated by Baun (US 4,563,824). This rejection is respectfully traversed.

The Office Action has indicated that Baun discloses all the claimed features of independent claim 1, and in particular that Baun discloses the claimed multiple discs, the claimed disc pushers to push circumferences of the discs, and the claimed biasing units that are slidably provided outside the hub unit and push circumferences of spacers, noting that the spacers provide spacing between discs. Applicants respectfully disagree.

Rather than disclosing or suggesting multiple discs, Baun sets forth a device for cutting the center holes in individual discs, where once a disc is centered the center hole is cut. See Baun in the flowcharts of FIGS 7A and 7B and the illustrated centering/cutting device shown in FIG. 2.

Thus, the cutting/centering device of Baun only operates on one disc at a time, which means that there is no need for the claimed spacers, which provide spacing between discs. Here, it is briefly noted that the Office Action, on page 2, apparently has interpreted reference numerals 205, 210, and 215 as corresponding to "discs," but as discussed below, these reference numerals merely refer to radial lines potentially spaced 120 degrees apart and referring to the orientation of the three individual disc pusher/centering devices.

Similarly, Baun fails to disclose or suggest the claimed biasing units that are slidably provided outside the hub unit and push circumferences of spacers.

It is not clear how the Office Action is interpreting the claimed spacers, with a brief reference to elements 100, 130, and 150 as apparently corresponding to the claimed spacers on page 3 of the Office Action.

However, assemblies 100, 130, and 150 are centering devices for pushing the circumference of the disc and are arranged along radial lines 205, 210, and 215, respectively. Here, each assembly further comprises disc pusher elements 120, 147, and 170 for actually contacting and pushing the circumference of the disc.

Here, the Office Action has further already interpreted the disc pusher elements 120, 147, and 170 as corresponding to the claimed disc pushers, but since the disc pusher elements are part of the assemblies 100, 130, and 150, the page 3 Office Action interpretation of assemblies 100, 130, and 150 cannot be correct, i.e., the assemblies 100, 130, and 150 cannot correspond to the claimed "spacers."

Briefly, it is noted that the present application has set forth a clear example of how a "spacer" is to be interpreted, i.e., as devices placed between two disc to maintain a "spacing" between the two discs. See spacers 14 illustrated in FIGS. 2-4 of the present invention.

However, the Office Action appears to be interpreting the term "spacer" as any device to space or move a disc. It is respectfully submitted that this interpretation is incorrect.

As a general proposition, claim limitations are to be interpreted in light of its broadest reasonable interpretation. In re Prater, 162 USPQ 541, 550-51 (CCPA 1969), cited with approval, In re Morris, 44 USPQ2d 1023, 1028 (Fed. Cir. 1997). Further, the claims should be interpreted in light of their plain meaning as understood by one of ordinary skill in the art. In re Zletz, 13 USPQ2d 1320, 1322 (Fed. Cir. 1989), citing, In re Prater. However, the broadest reasonable interpretation must also conform to the broadest reasonable interpretation afforded by one of ordinary skill in the art **when read in light of the specification**. In re Prater, 162 USPQ 541, 550-51, In re Morris, 44 USPQ2d at 1027, MPEP 2111.01 (7th Ed., rev. 1)(Feb. 2000).

Here, assuming the Office Action is taking such an incorrect interpretation of "spacer," it is further respectfully submitted that this interpretation is contrary to the disclosure of the present invention, as well as being contrary to the use of the same term by one of ordinary skill in the art, where the term "spacers" is known as being the devices placed between discs to separate discs.

Thus, it is respectfully submitted that Baun fails to disclose or suggest the claimed

multiple discs, the claimed disc pushers to push circumferences of the discs, and the claimed biasing units that are slidably provided outside the hub unit and push circumferences of spacers, as set forth in independent claim 1.

Therefore, for at least the above, it is respectfully requested that this rejection of independent claim 1 be withdrawn and independent claim 1 be allowed. In addition, it is respectfully submitted that claims depending from independent claim 1 are also in proper allowable condition.

CONCLUSION:

In accordance with the foregoing, Applicants respectfully submit that all outstanding objections and rejections have been overcome and/or rendered moot, and further, that all pending claims patentably distinguish over the cited art

If the Examiner has any remaining issues to be addressed, it is believed that prosecution can be expedited by the Examiner contacting the undersigned attorney for a telephone interview to discuss resolution of such issues.

If there are any underpayments or overpayments of fees associated with the filing of this Amendment, please charge and/or credit the same to our Deposit Account No. 19-3935.

Respectfully submitted,

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